

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DOUGLAS MARSHALL, et al.,	:	Case No. 2:21-cv-04336 GEKP
Plaintiffs,	:	
v.	:	
PETER C. AMUSO, et al.,	:	
Defendants.	:	

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Fed.R.Civ.P. 65, Plaintiffs hereby move to preliminarily enjoin Defendants from enforcing the subjective and viewpoint-discriminatory terms in Pennsbury School Board Policies 903 and 922, including “personally directed,” “abusive,” “irrelevant,” “offensive,” “otherwise inappropriate,” “personal attack,” “inappropriate,” and “intolerant,” and the address announcement requirement in Policy 903. In the alternative, Plaintiffs request that this Court enjoin the enforcement of Policies 903 and 922 in their entirety.

In support of this motion, Plaintiffs rely upon the attached Brief in Support of Plaintiffs' Motion for Preliminary Injunction, the Declarations of Douglas Marshall, Robert Abrams, Tim Daly, and Simon Campbell, Exhibits A-N, the video record of specified Pennsbury School Board meetings, the complaint, and any other material the Court may receive or of which the Court may take judicial notice.

Because of the importance of the issues, Plaintiffs request oral argument.

Dated: October 8, 2021

Respectfully submitted,

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